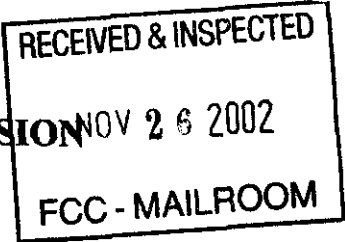


**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**



In the Matter of)
)
Amendment of 73.202(b),)
Table of Allotments,)
FM Broadcast Stations.)
(Nantucket, Massachusetts))

MB Docket No. _____

To: Assistant Chief; Audio Division
Media Bureau

PETITION FOR RULE MAKING

Pursuant to 47 C.F.R. 1.401, Paul B. Christensen (hereinafter "Petitioner") respectfully petitions the Federal Communications Commission to institute a Rule Making proceeding to amend the FM Table of Allotments to add Channel Number 249, Class A at Nantucket, Massachusetts.

Proposal by Petitioner:

<u>City</u>	<u>Channel Numbers</u>	
	<u>Present</u>	<u>Proposed</u>
Nantucket, Massachusetts	242B	242B, 249A

DISCUSSION

Petitioner respectfully submits that the public interest would be served by allocating Channel 249A to Nantucket, Massachusetts, as that community's second local aural FM transmission service. Nantucket, Massachusetts is located in Nantucket County and has a population of 9,520.'

The City of Nantucket is incorporated within the State of Massachusetts. The City of Nantucket supports its own city government, police department, fire department, post office, public schools, local churches, a weekly newspaper, and a full range of local businesses.

Attached hereto and made ~~part~~ of ~~this~~ petition is a Technical Exhibit in support of the requested allotment. ~~Based~~ on the information contained therein, it appears that the requested channel could be allotted to Nantucket, Massachusetts in compliance with the ~~minimum~~ distance separation requirements of §73.207(b) of the Commission's rules?

Reference Coordinates are:

41-17-12 North Latitude (NLAT)
70-06-06 West Longitude (WLONG)

Should this petition be granted, and Channel 249A be allotted to Nantucket, Massachusetts, Petitioner will apply for Channel 249A and after it is authorized, will promptly construct the new facility.

In accordance with Section 1.52 of the Commission's Rules and Regulations, I hereby certify that I have examined the foregoing Petition for Rule Making and ~~the~~ attached ~~Technical~~ Exhibit, and that ~~both~~ are true and ~~correct~~ to the ~~best~~ of my knowledge and belief.

WHEREFORE, it is respectfully requested that ~~the~~ instant petition be granted and that the FM Table of Allotments, section 73.202(b) be amended ~~as~~ requested herein.

Respectfully submitted,



Paul B. Christensen, Esq.
LAW OFFICES of PAUL B. CHRISTENSEN, P.A.
3749 ~~Southern~~ Hills Drive
Jacksonville, Florida 32225
Office: (904) 379-7802
Facsimile: (904) 379-7803
attorney@broadcast.net

November 19, 2002

² See revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992)

TECHNICAL EXHIBIT

IN SUPPORT OF
PETITION FOR RULE MAKING
NEW FM – CHANNEL 249A
NANTUCKET, MASSACHUSETTES

PAUL B. CHRISTENSEN
PETITIONER

INTRODUCTION

This Technical Exhibit supports the petition by Paul B. Christensen (hereinafter “Petitioner”), who seeks to amend the FM Table of Allotments, §73.202(b) of the Federal Communications Commission’s Rules, by allocating FM Channel 249A to Nantucket, Massachusetts as that community’s second local FM aural service.

ALLOCATION

A comprehensive engineering study was performed, utilizing the current FCC/NTIS database to determine the feasibility of allocating FM Channel 249A to Nantucket, Massachusetts, subject to the §73.207(b) minimum distance requirements of the Commission’s Rules. The study incorporates all applicable co-channel, adjacent-channel, and intermediate-frequency separations. The results of the study indicate that FM Channel 249A may be allocated to Nantucket in full compliance with §73.207(b).

Attached hereto as Exhibit A is an “area-to-locate” study for FM Channel 249A. The Exhibit depicts the required protection contours **from** all relevant co-channel, adjacent channel, and intermediate-frequency-limited stations and allocations. **As** indicated,

ample area exists immediately in and near the community boundary in which the proposed facilities may be located.

Assuming a maximum effective radiated power of six (6) Kilowatts and the installation of an omni-directional antenna placed at one hundred (100) meters above average terrain, the proposed transmission facilities could be located in or near the community's boundaries while maintaining the requisite city-grade (70 dBu) coverage contour over the entire city, in full compliance with §73.315(a) and (b). Attached hereto and presented as Exhibit B is a graphical representation of a city-grade service contour from the Petitioner's geographical reference coordinates, located within the permissible area-to-locate geographical area.

CONCLUSION

As demonstrated herein, the proposed amendment to the FM Table of Allotments can be achieved in compliance with §73.207(b), and §73.315(a) and (b) and will not create a short-spacing condition **to** any existing station, pending application, or vacant allotment; nor will the amendment result in the reallocation of any station, pending application or vacant allotment.

73.207 Analysis

Job: Nantucket.fmj

Master Database:

Lat: N41:17:12 Lon: W070:06:06 NAD-83

Scale: 1:500000

Channel: 249 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km, Clearance: -0.5km

Comments: No Comments

Description:

Date: 11/18/02 1:42:07 PM

Key:

Short

Clear

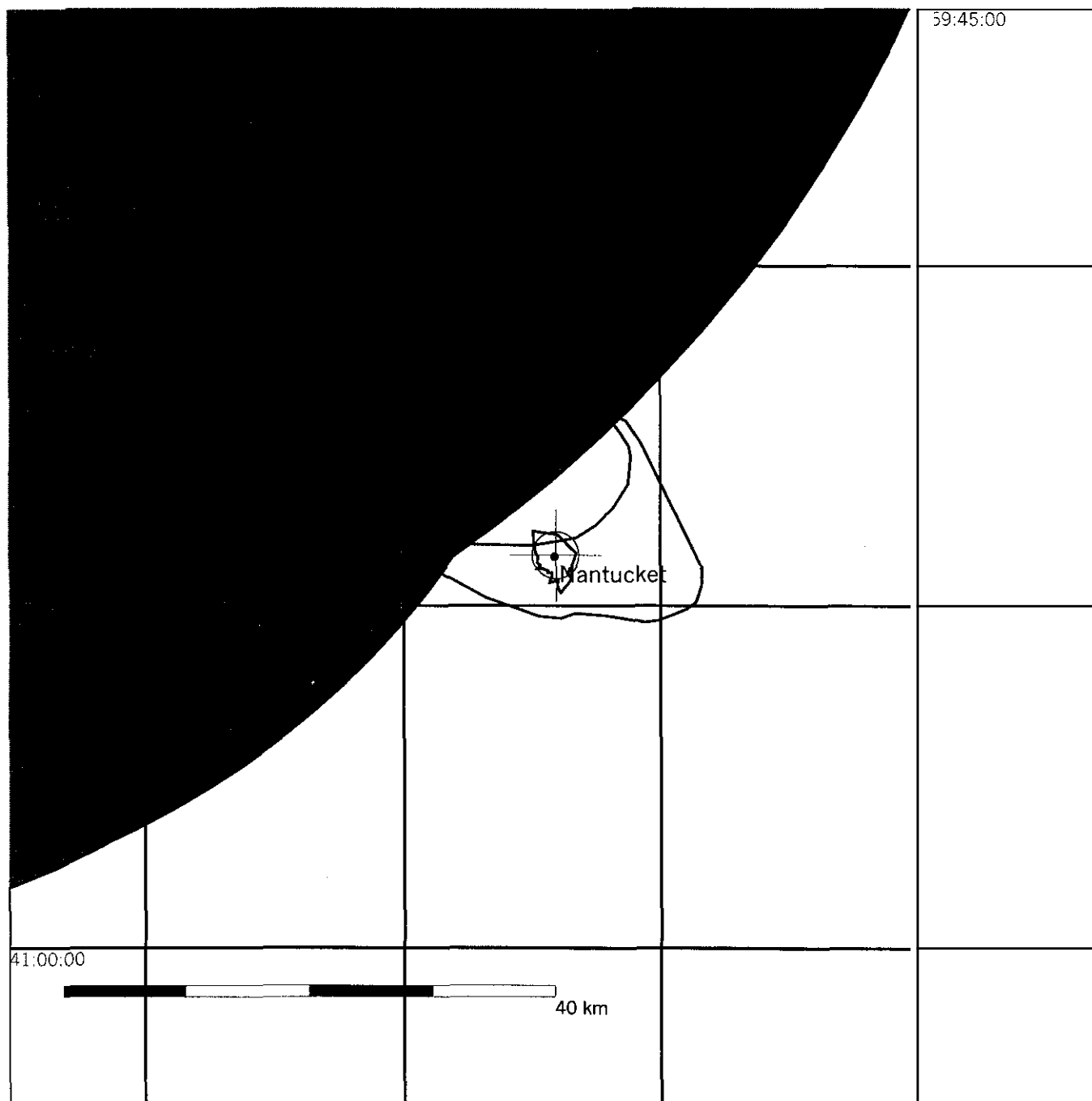


EXHIBIT B

Contour Analysis

Job: Nantucket.fmj

Master Database:

Lat: N41:17:12 Lon: W070:06:06 NAD-83

Scale: 1:750000

Channel: 249 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km, Clearance: -0.5km

Comments: No Comments

Description:

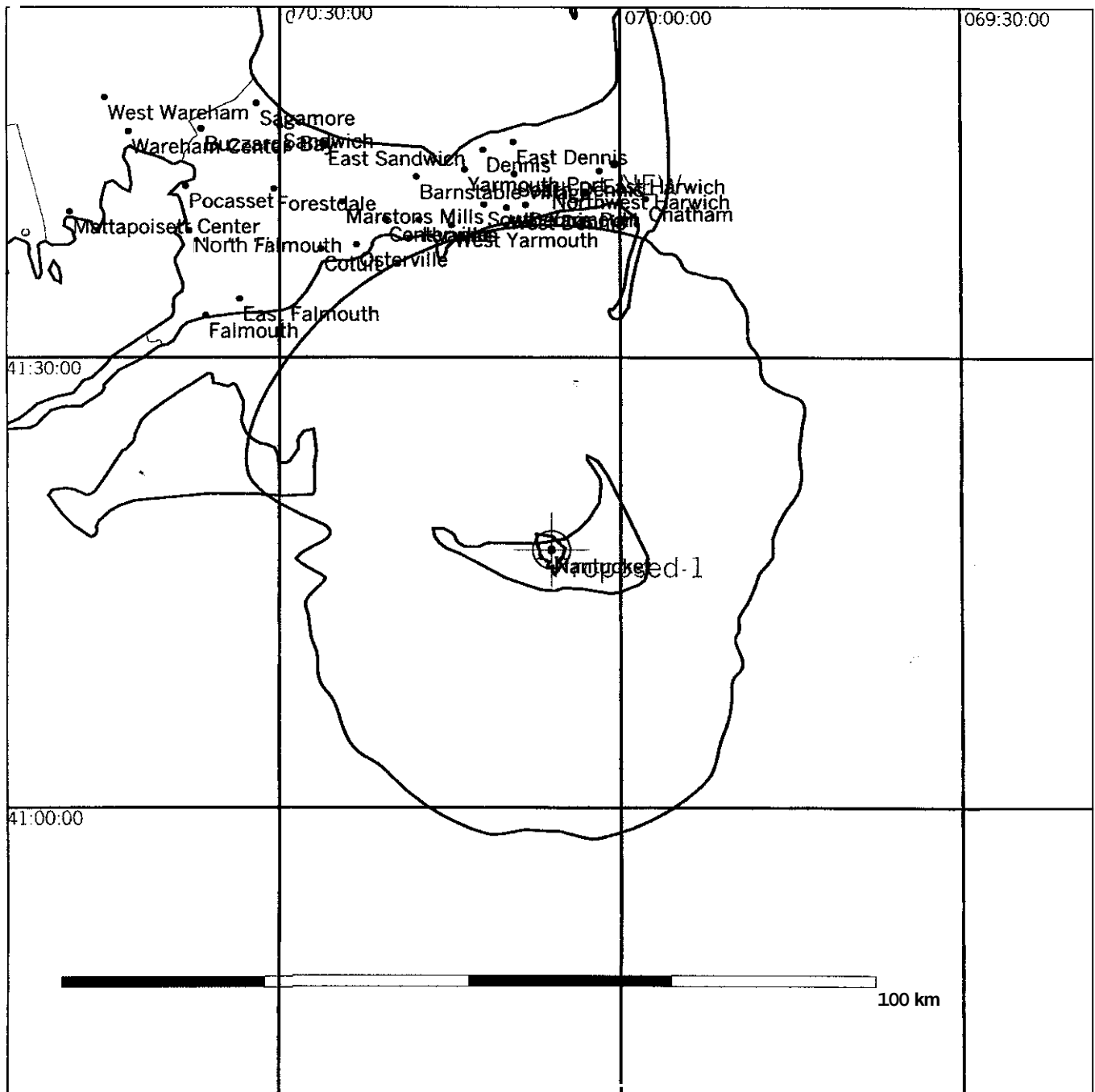
Date: 11/18/02 1:42:23 PM

Key:

Service

Protected

2nd/3rd Adj



**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Amendment of 73.202(b),)
Table of Allotments,)
FM Broadcast Stations.)
(Nantucket, Massachusetts))

MB Docket No. _____

To: Assistant Chief, Audio Division
 Media Bureau

PETITION FOR RULE MAKING

Pursuant to 47 C.F.R. 1.401, Paul B. Christensen (hereinafter "Petitioner") respectfully petitions **the** Federal Communications Commission to institute a Rule Making proceeding to amend the FM Table of Allotments to add Channel Number 249, Class A at Nantucket, Massachusetts.

Proposal by Petitioner:

<u>City</u> ^	<u>Channel Numbers</u>	
	<u>present</u>	<u>Proposed</u>
Nantucket, Massachusetts	242B	242B, 249A

DISCUSSION

Petitioner respectfully submits that the public interest would be served by allocating Channel 249A to Nantucket, Massachusetts, ~~as that~~ community's second local aural FM transmission service. Nantucket, Massachusetts is located in Nantucket **County** and has a population of 9,520.¹

The City of Nantucket is incorporated within the State of Massachusetts. The City of Nantucket supports its own city government, police department, fire department, ~~post~~ office, public schools, local churches, a weekly newspaper, and **a full** range of local businesses.

¹ **Census 2000**, United States Department of Commerce, U.S. **Census Bureau**

Attached hereto and made part of this petition is a Technical Exhibit in support of the requested allotment. Based on the information contained therein, it appears that the requested channel could be allotted to Nantucket, Massachusetts in compliance with the minimum distance separation requirements of §73.207(b) of the Commission's rules.²

Reference Coordinates are:

41-17-12 North Latitude (NLAT)
70-06-06 West Longitude (WLONG)

Should this petition be granted, and Channel 249A be allotted to Nantucket, Massachusetts, Petitioner will apply for Channel 249A and after it is **authorized**, will promptly construct the new facility.

In accordance with Section 1.52 of ~~the~~ Commission's Rules **and** Regulations, I hereby **certify** that I have examined the foregoing Petition for Rule **Making** and the attached Technical Exhibit, and that both are true **and** correct to the best of my knowledge and belief.

WHEREFORE, it is respectfully requested that the instant petition be granted **and** that the FM Table of Allotments, section 73.202(b) be amended **as** requested herein.

Respectfully submitted,



Paul B. Christensen, Esq.
LAW OFFICES of **PAUL B. CHRISTENSEN, P.A.**
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Jacksonville, Florida 32225
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Facsimile: (904) 379-7803
attorney@broadcast.net

November 19, 2002

² See revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992)

TECHNICAL EXHIBIT

IN SUPPORT OF
PETITION FOR RULE MAKING
NEW FM – CHANNEL 249A
NANTUCKET, MASSACHUSETTES

PAUL B. CHRISTENSEN
PETITIONER

INTRODUCTION

This Technical Exhibit supports the petition by Paul B. Christensen (hereinafter “Petitioner”), who seeks to amend the FM Table of Allotments, §73.202(b) of the Federal Communications Commission’s Rules, by allocating FM Channel 249A to Nantucket, Massachusetts ~~as~~ that community’s second local FM aural service.

ALLOCATION

A comprehensive engineering study was performed, utilizing the current FCC/NTIS database to determine the feasibility of allocating FM Channel 249A to Nantucket, Massachusetts, subject to the §73.207(b) minimum distance requirements of the Commission’s Rules. The study incorporates all applicable co-channel, adjacent-channel, and intermediate-frequency separations. The results of the study indicate that FM Channel 249A may be allocated to Nantucket in full compliance with §73.207(b).

Attached hereto as Exhibit A is an “area-to-locate” study for FM Channel 249A. The Exhibit depicts the required protection contours from all relevant co-channel, adjacent channel, and intermediate-frequency-limited stations and allocations. ~~As~~ indicated,

ample area exists immediately in and near the community boundary in which the proposed facilities may be located.

Assuming a maximum effective radiated power of **six (6)** Kilowatts and the installation of an omni-directional antenna placed at one hundred (100) meters above average terrain, the proposed transmission facilities could be located in or near the community's boundaries while maintaining the requisite city-grade (70 dBu) coverage contour over the entire city, in full compliance with §73.315(a) and (b). Attached hereto and presented as Exhibit B is a graphical representation of a city-grade service contour from the Petitioner's geographical reference coordinates, located within the permissible area-to-locate geographical area.

CONCLUSION

As demonstrated herein, the proposed amendment to the FM Table of Allotments can be achieved in compliance with §73.207(b), and §73.315(a) and (b) and will not create a short-spacing condition to any existing station, pending application, **or** vacant allotment; nor will the amendment result in the reallocation **of** any station, pending application or vacant allotment.

73.207 Analysis

Job: Nantucket.fmj
 Master Database:
 Lat: N41:17:12 Lon: W070:06:06 NAD-83
 Scale: 1:500000
 Channel 249 Class: A
 Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved
 Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6
 Range: 100km, Clearance: -0.5km
 Comments: No Comments
 Description:

Date: 11/18/021:42:07 PM
 Key:
 Short
 Clear

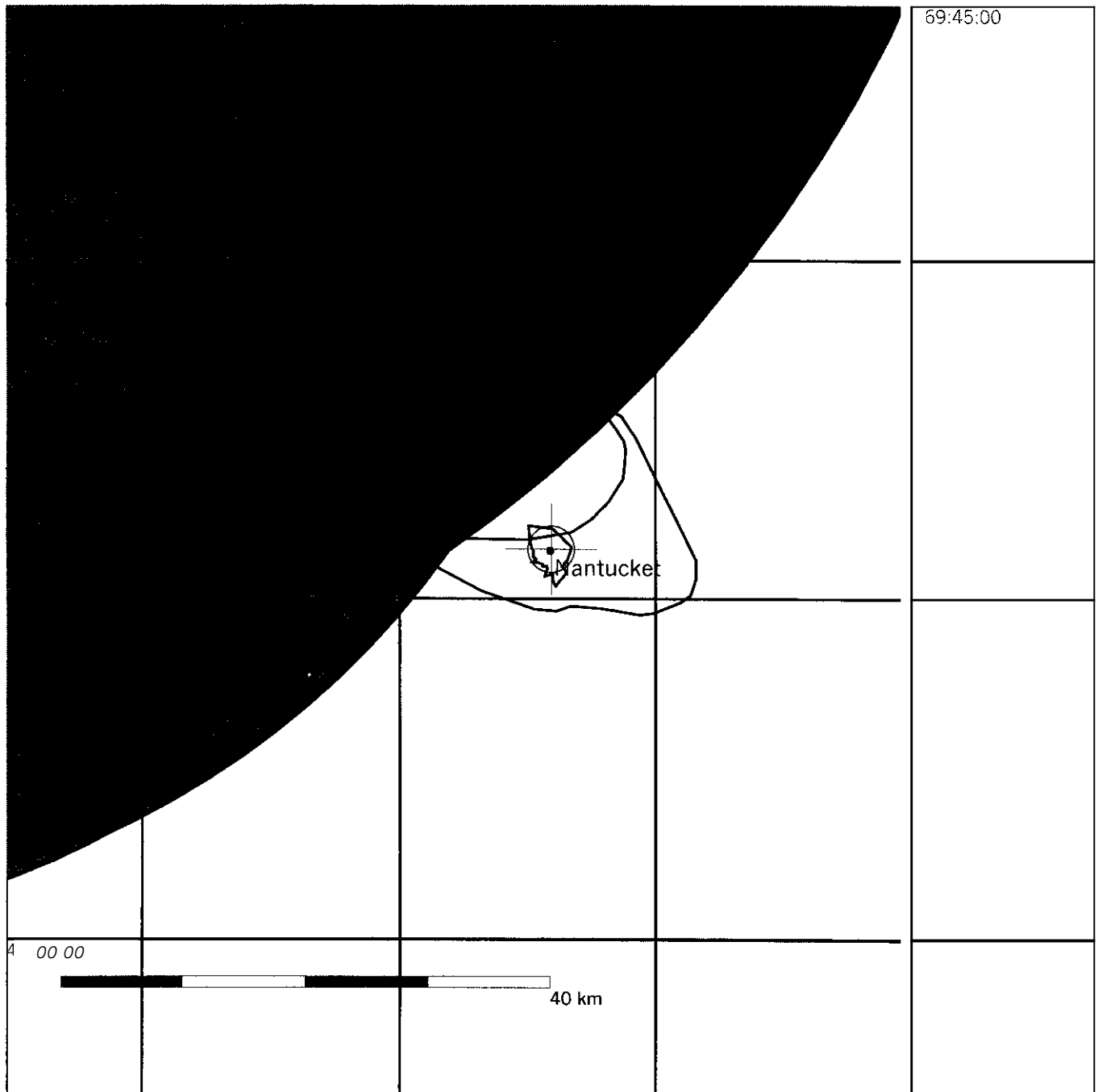


EXHIBIT B

Contour Analysis

Job: Nantucket.fmj

Master Database:

Lat: N41:17:12 Lon: W070:06:06 NAD-83

Scale: 1:750000

Channel 249 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km, Clearance: -0.5km

Comments: No Comments

Description:

Date: 11/18/02 1:42:23 PM

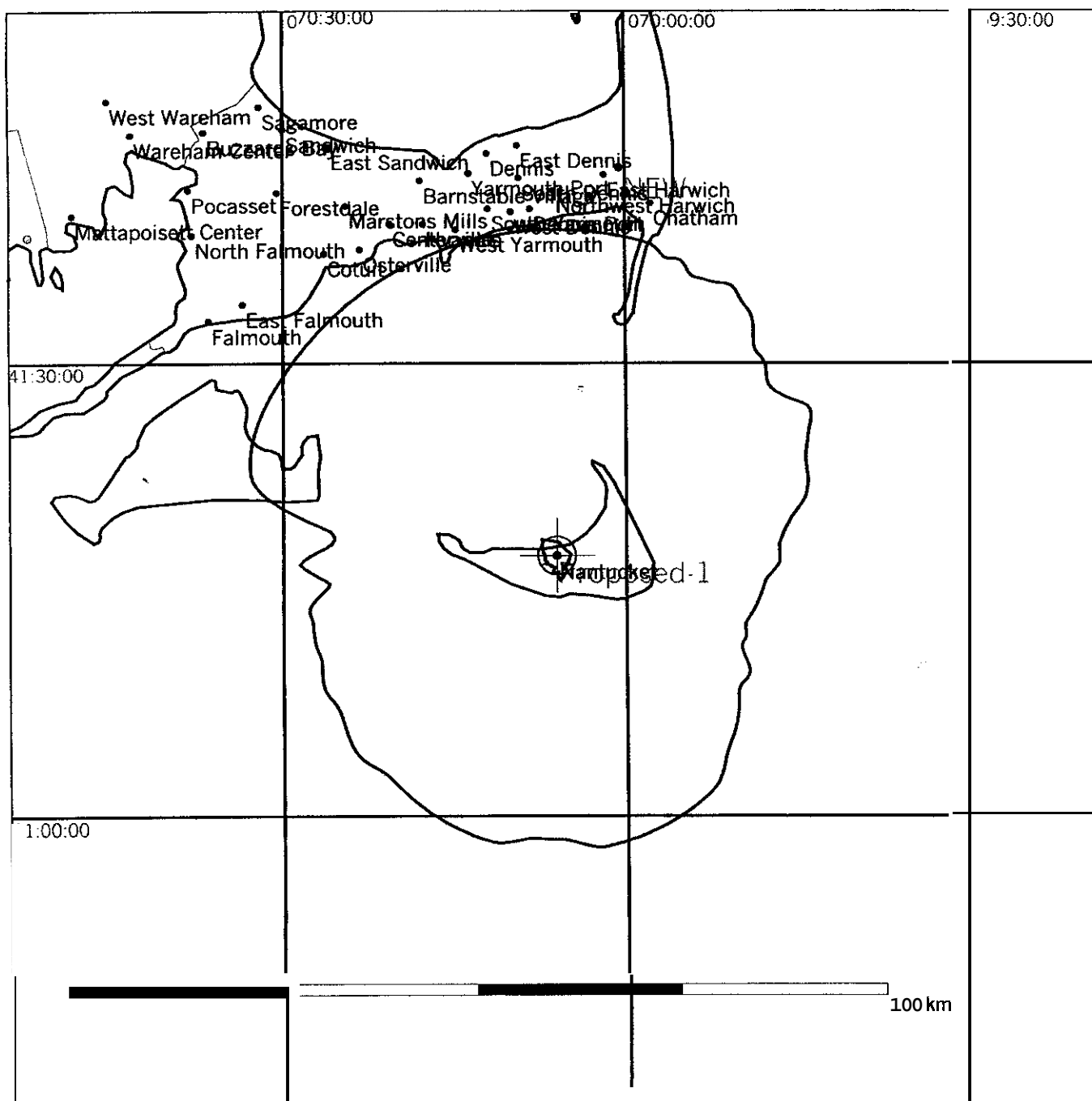
Key:

Service

Protected

SAU

2nd/3rd Adj



**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Amendment of 73.202(b),)
Table of Allotments,)
FM Broadcast Stations.)
(Nantucket, Massachusetts))

MB Docket No. _____

To: Assistant Chief, Audio Division
 ~~Media~~ Bureau

PETITION FOR RULE MAKING

Pursuant to 47 C.F.R. 1.401, Paul B. Christensen (hereinafter "Petitioner") respectfully petitions the Federal Communications Commission to institute a Rule Making proceeding to amend the FM Table of Allotments to add Channel Number 249, Class A at Nantucket, Massachusetts.

Proposal by Petitioner:

<u>City</u> ~	<u>Channel Numbers</u>	
	present	<u>Proposed</u>
Nantucket, Massachusetts	242B	242B, 249A

DISCUSSION

Petitioner respectfully submits that the public interest would be served by allocating Channel 249A to Nantucket, Massachusetts, **as** that community's second local aural FM transmission service. Nantucket, Massachusetts is located in Nantucket County and **has** a population of 9,520.¹

The City of Nantucket is incorporated within the State of Massachusetts. The City of Nantucket supports **its** own city government, police department, fire department, ~~post~~ office, public schools, local churches, a weekly newspaper, **and a full** range of local businesses.

¹ Census 2000, United States Department of Commerce, U.S. Census Bureau

Attached ~~hereto~~ and made part of this petition is a Technical Exhibit in support of the requested allotment. Based on the information ~~contained~~ therein, it appears that the requested channel ~~could~~ be allotted to Nantucket, Massachusetts in compliance with the minimum distance separation requirements of §73.207(b) of the Commission's rules?

Reference Coordinates are:

41-17-12 North Latitude (NLAT)
70-06-06 West Longitude (WLONG)

Should ~~this~~ petition be granted, and Channel 249A be allotted to Nantucket, Massachusetts, Petitioner will apply for Channel 249A and after it is authorized, will promptly construct the new facility.

In accordance with Section 1.52 of ~~the~~ Commission's Rules and Regulations, I hereby certify that I have examined the foregoing Petition for Rule Making and the ~~attached~~ Technical Exhibit, and that both are true and ~~correct~~ to the best of my knowledge and belief.

WHEREFORE, it is respectfully requested ~~that~~ the instant petition be granted and that the FM Table of Allotments, section 73.202(b) be amended ~~as~~ requested herein.

Respectfully submitted,



Paul B. Christensen, Esq.
LAW OFFICES of PAUL B. CHRISTENSEN, P.A.
3749 Southern Hills Drive
Jacksonville, Florida 32225
Office: (904) 379-7802
Facsimile: (904) 379-7803
attorney@broadcast.net

November 19, 2002

² See revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992)

TECHNICAL EXHIBIT

IN SUPPORT OF
PETITION FOR RULE MAKING
NEW FM – CHANNEL 249A
NANTUCKET, MASSACHUSETTES

PAUL B. CHRISTENSEN
PETITIONER

INTRODUCTION

This Technical Exhibit supports the petition by Paul B. Christensen (hereinafter “Petitioner”), who seeks to amend the FM Table of Allotments, §73.202(b) of the Federal Communications Commission’s Rules, by allocating FM Channel 249A to Nantucket, Massachusetts as that community’s second local FM aural service.

ALLOCATION

A comprehensive engineering study was performed, utilizing the current FCC/NTIS database to determine the feasibility of allocating FM Channel 249A to Nantucket, Massachusetts, subject to the §73.207(b) minimum distance requirements of the Commission’s Rules. The study incorporates all applicable co-channel, adjacent-channel, and intermediate-frequency separations. The results of the study indicate that FM Channel 249A may be allocated to Nantucket in full compliance with §73.207(b).

Attached hereto as Exhibit A is an “area-to-locate” study for FM Channel 249A. The Exhibit depicts the required protection contours from all relevant co-channel, adjacent channel, and intermediate-frequency-limited stations and allocations. As indicated,

ample area exists immediately in and near the community boundary in which the proposed facilities may be located.

Assuming a maximum effective radiated power of six (6) Kilowatts **and** the installation of an omni-directional antenna placed at one hundred (100) meters above average terrain, the proposed transmission facilities could be located in or near the community's boundaries while maintaining the requisite city-grade (70 dBu) coverage contour over the entire city, in full compliance with §73.315(a) and (b). Attached hereto and presented as Exhibit B is a graphical representation of a city-grade service contour from the Petitioner's geographical reference coordinates, located within the permissible area-to-locate geographical area.

CONCLUSION

As demonstrated herein, the proposed amendment to the FM Table of Allotments can be achieved in compliance with §73.207(b), and §73.315(a) and (b) and will not create a short-spacing condition to any existing station, pending application, or vacant allotment; nor will the amendment result in the reallocation of any station, pending application or vacant allotment.

EXHIBIT A

73.207 Analysis

Job Nantucket.fmj

Master Database:

Lat: N41:17:12 Lon: W070:06:06 NAD-83

Scale: 1:500000

Channel: 249 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km, Clearance: -0.5km

Comments: No Comments

Description:

Date: 11/18/02 1:42:07 PM

Key:

Short

Clear

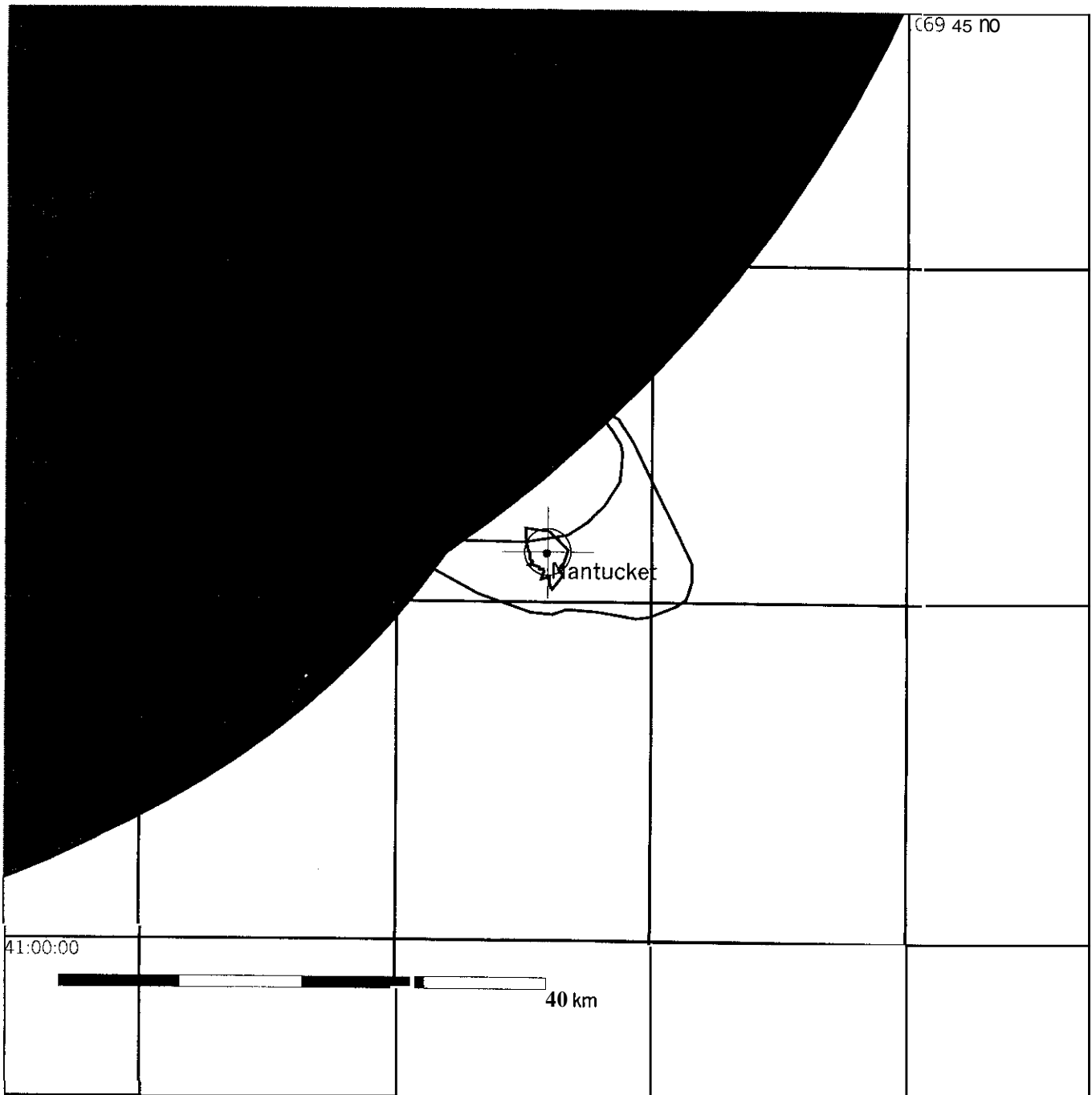


EXHIBIT B

Contour Analysis

Job: Nantucket.fmj

er I ita base:

Lat: N41:17:12 Lon: W070:06:06 NAD

Scale: 1:750000

Channel: 249 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km, Clearance: -0.5km

Comments: No Comments

Description:

Date: 11/18/02 1:42:23 PM

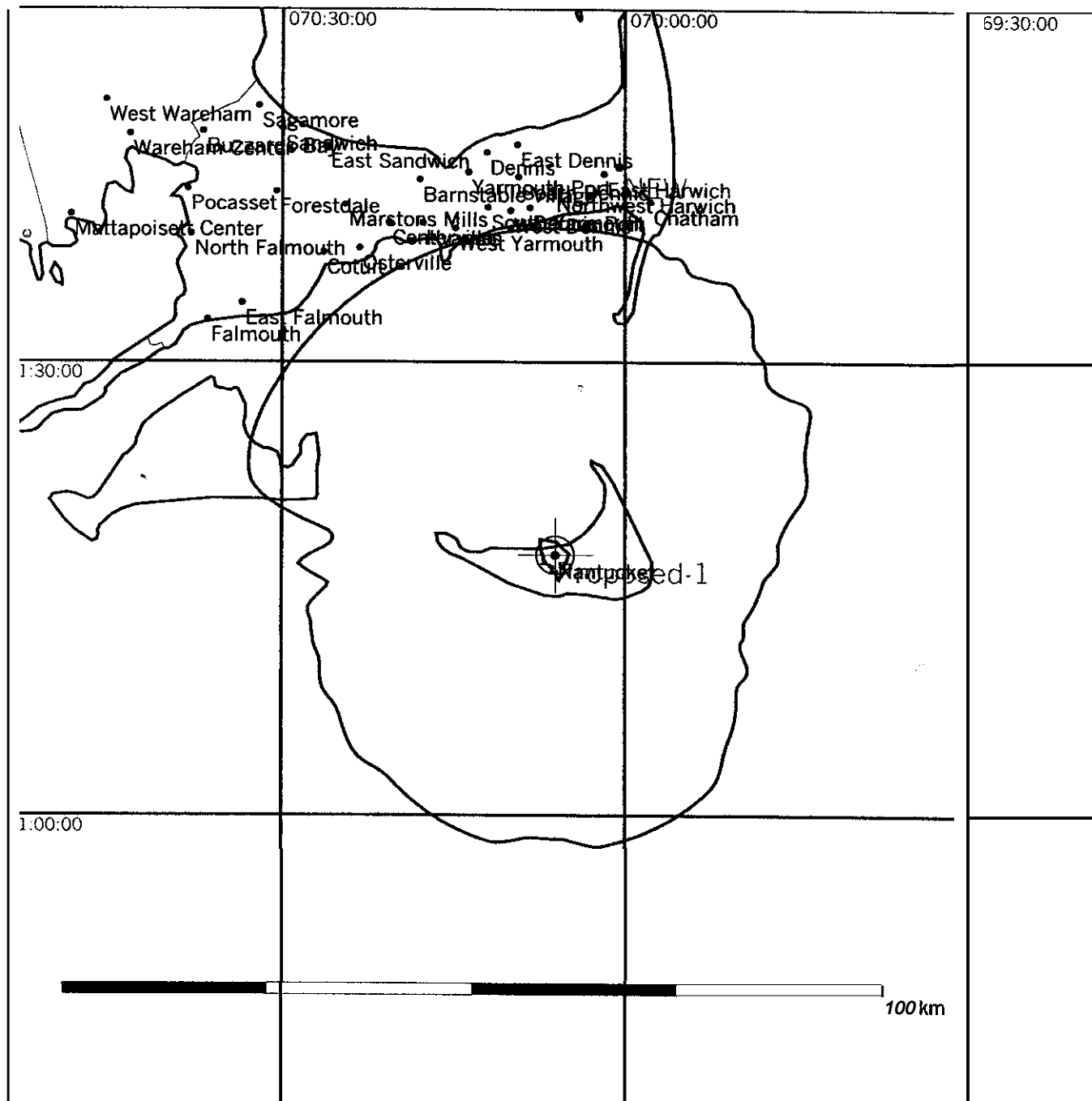
Key:

Service

Protected

1st Adj

2nd/3rd Adj



**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Amendment of 73.202(b),)
Table of Allotments,)
FM Broadcast Stations.)
(Nantucket, Massachusetts))

MB Docket No. _____

To: Assistant Chief, Audio Division
 Media Bureau

PETITION FOR RULE MAKING

Pursuant to 47 C.F.R. 1.401, Paul B. Christensen (hereinafter "Petitioner") respectfully petitions the Federal Communications Commission to institute a Rule Making proceeding to amend the FM Table of Allotments to add Channel Number 249, Class A at Nantucket, Massachusetts.

Proposal by Petitioner:

<u>City</u> ¹	<u>Channel Numbers</u>	
	present	<u>Proposed</u>
Nantucket, Massachusetts	242B	242B, 249A

DISCUSSION

Petitioner respectfully submits that the public interest would be served by allocating Channel 249A to Nantucket, Massachusetts, **as** that community's second local aural FM transmission service. Nantucket, Massachusetts is located in Nantucket County and **has** a population of 9,520.¹

The City of Nantucket is incorporated within **the** State of Massachusetts. The City of Nantucket supports its own city government, police department, fire department, **post** office, public schools, local churches, a weekly newspaper, **and** a full range of local businesses.

¹ Census 2000, United States Department of **Commerce**, U.S. Census Bureau

Attached hereto and ~~made part~~ of this petition is a Technical Exhibit in ~~support~~ of the requested allotment. ~~Based~~ on the information contained therein, it appears that the requested channel could be allotted to Nantucket, Massachusetts in compliance with the minimum distance separation requirements of §73.207(b) of the Commission's rules.'

Reference Coordinates ~~are~~:

41-17-12 North Latitude (NLAT)
70-06-06 West Longitude (WLONG)

Should this petition be granted, and Channel 249A be allotted to Nantucket, Massachusetts, Petitioner will apply for Channel 249A and ~~after~~ it is authorized, will promptly construct the new facility.

~~In~~ accordance with Section 1.52 of the Commission's Rules and Regulations, I hereby ~~certify~~ that I have examined the foregoing Petition for Rule Making and the attached Technical Exhibit, and that both are true and correct to the ~~best~~ of my knowledge and belief.

WHEREFORE, it is respectfully requested that the instant petition be granted and that the FM Table of Allotments, section 73.202(b) be amended ~~as~~ requested herein.

Respectfully submitted,



Paul B. Christensen, Esq.
LAW OFFICES of PAUL B. CHRISTENSEN, P.A.
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Jacksonville, Florida 32225
Office: (904) 379-7802
Facsimile: (904) 379-7803
attorney@broadcast.net

November 19, 2002

² See revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992)

TECHNICAL EXHIBIT

IN SUPPORT OF
PETITION FOR RULE MAKING
NEW FM – CHANNEL 249A
NANTUCKET, MASSACHUSETTES

PAUL, B. CHRISTENSEN
PETITIONER

INTRODUCTION

This Technical Exhibit supports the petition by Paul B. Christensen (hereinafter “Petitioner”), who seeks to amend the FM Table of Allotments, §73.202(b) of the Federal Communications Commission’s Rules, by allocating FM Channel 249A to Nantucket, Massachusetts as that community’s second local FM aural service.

ALLOCATION

A comprehensive engineering study was performed, utilizing the current FCC/NTIS database to determine the feasibility of allocating FM Channel 249A to Nantucket, Massachusetts, subject to the §73.207(b) minimum distance requirements of the Commission’s Rules. The study incorporates all applicable co-channel, adjacent-channel, and intermediate-frequency separations. The results of the study indicate that FM Channel 249A may be allocated to Nantucket in full compliance with §73.207(b).

Attached hereto as Exhibit A is an “area-to-locate” study for FM Channel 249A. The Exhibit depicts the required protection contours from all relevant co-channel, adjacent channel, and intermediate-frequency-limited stations and allocations. **As** indicated,

ample area exists immediately in and near the community boundary in which the proposed facilities may be located.

Assuming a maximum effective radiated power of six (6) Kilowatts and the installation of an omni-directional antenna placed at one hundred (100) meters above average terrain, the proposed transmission facilities could be located in or near the community's boundaries while maintaining the requisite city-grade (70 dBu) coverage contour over the entire city, in full compliance with §73.315(a) and (b). Attached hereto and presented as Exhibit B is a graphical representation of a city-grade service contour from the Petitioner's geographical reference coordinates, located within the permissible area-to-locate geographical area.

CONCLUSION

As demonstrated herein, the proposed amendment to the FM Table of Allotments can be achieved in compliance with §73.207(b), and §73.315(a) and (b) and will not create a short-spacing condition to any existing station, pending application, or vacant allotment; nor will the amendment result in the reallocation of any station, pending application or vacant allotment.

EXHIBIT A

73.207 Analysis

Job: Nantucket.fmj

Master Database:

Lat: N41:17:12 Lon: W070:06:06 NAD-83

Scale: 1:500000

Channel 249 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, 1F, TV6

Range: 100 km, Clearance: -0.5km

Comments: No Comments

Description:

Date: 11/18/02 1:42:07 PM

Key:

Short

Clear

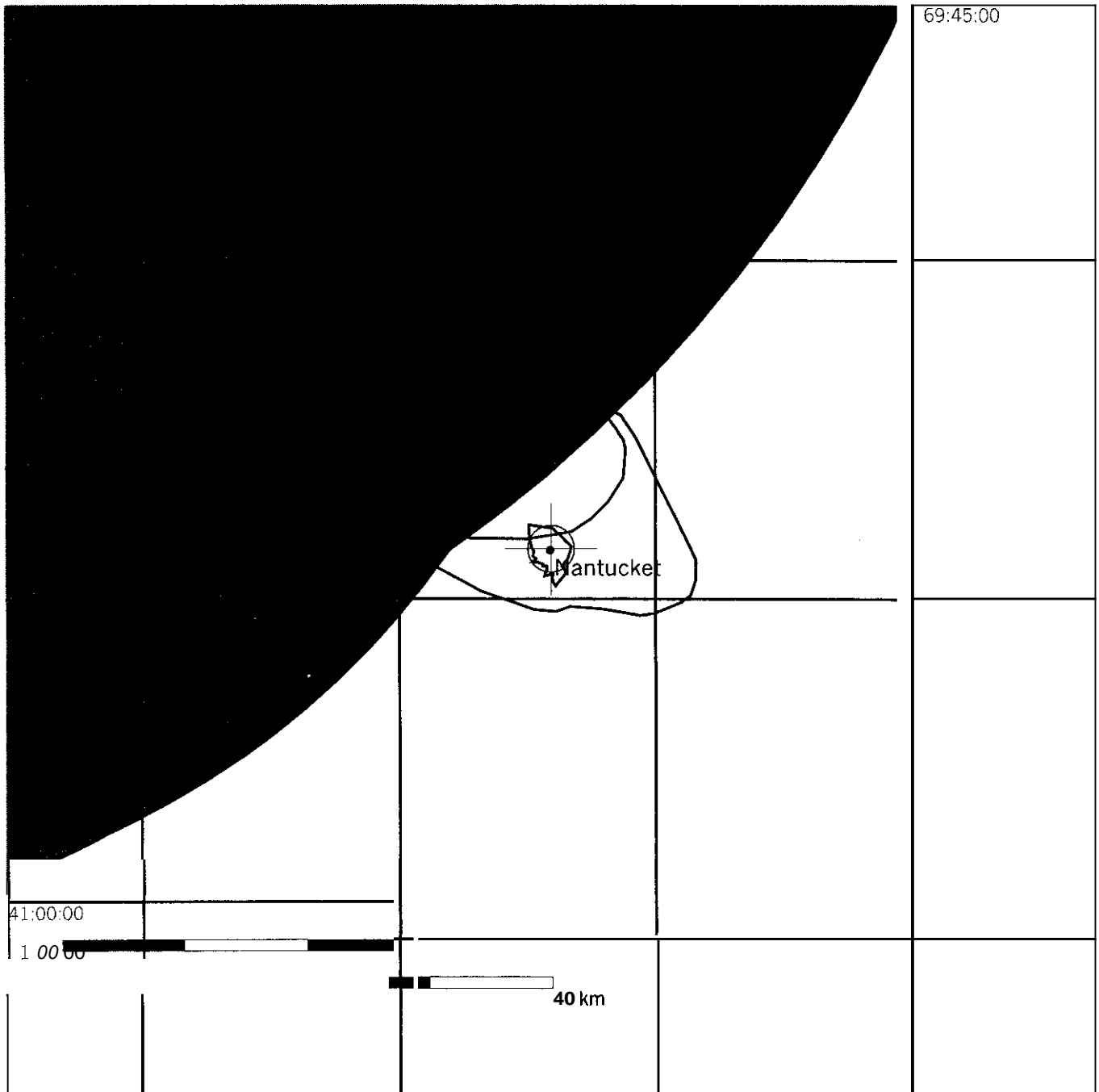


EXHIBIT B

Contour Analysis

Job Nantucket.fmj

Master Database:

Lat: N41:17:12 Lon: W070:06:06 NAD-83

Scale: 1:750000

Channel 249 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km, Clearance: -0.5km

Comments: No Comments

Description:

Date: 11/18/02 1:42:23 PM

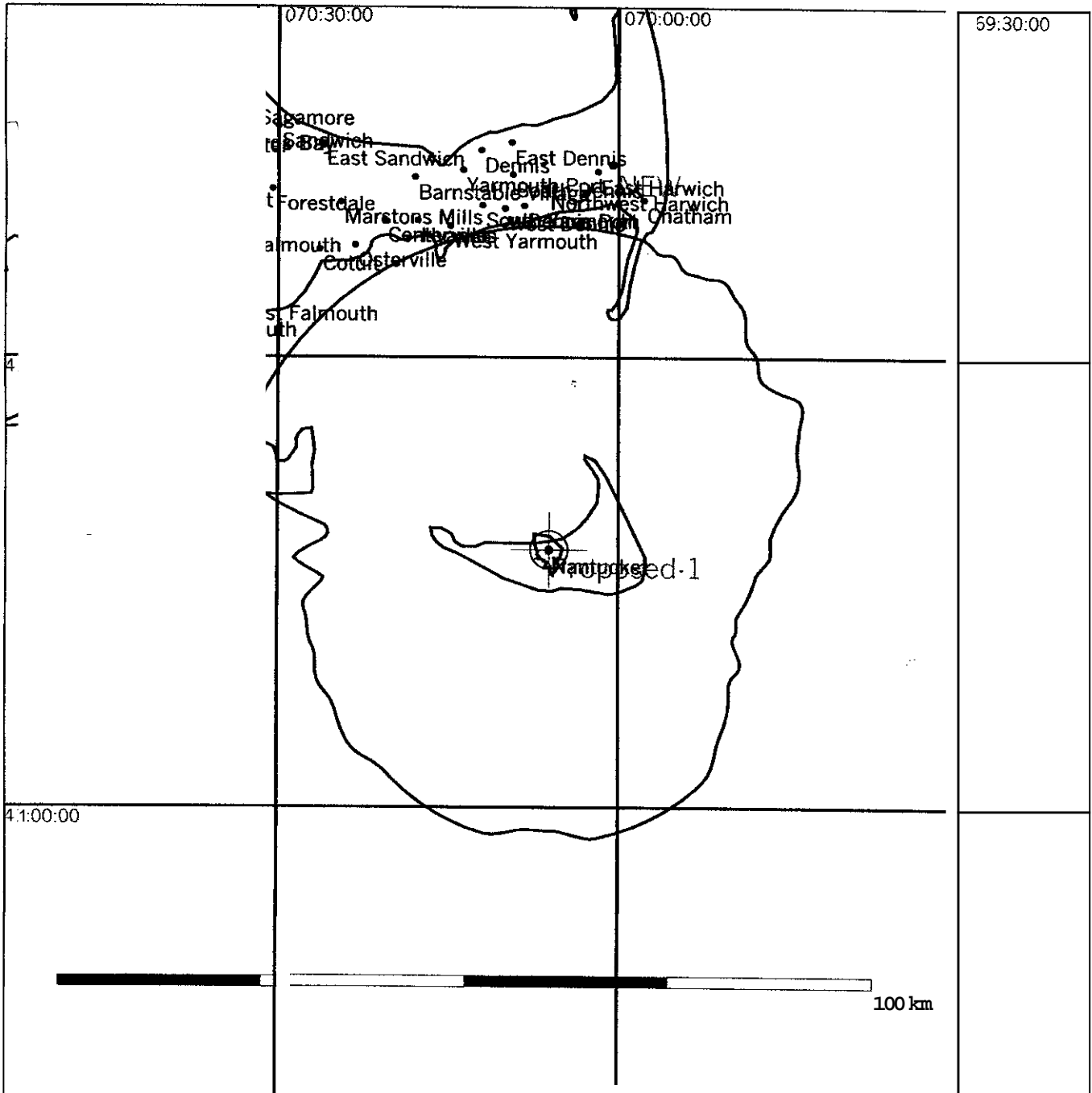
Key:

Service

Protected

1st Adj

2nd/3rd Adj



¹ Census 2000, United States Department of Commerce, U.S. Census Bureau

Attached hereto and made part of this petition is a Technical Exhibit in support of the requested allotment. Based on the information contained therein, it appears that the requested channel could be dotted to Nantucket, Massachusetts in compliance with the minimum distance separation requirements of §73.207(b) of the Commission's rules?

Reference Coordinates are:

41-17-12 North Latitude (NLAT)
70-06-06 West Longitude (WLONG)

Should this petition be granted, and Channel 249A be allotted to Nantucket, Massachusetts, Petitioner will apply for Channel 249A and after it is authorized, will promptly construct the new facility.

In accordance with Section 1.52 of the Commission's Rules and Regulations, I hereby certify that I have examined the foregoing Petition for Rule Making and the attached Technical Exhibit, and that both are true and ~~correct~~ to the best of my knowledge and belief.

WHEREFORE, it is respectfully requested that the ~~instant~~ petition be granted and that the FM Table of Allotments, section 73.202(b) be amended ~~as~~ requested herein.

Respectfully submitted,



Paul B. Christensen, Esq.
LAW OFFICES of PAUL B. CHRISTENSEN, P.A.
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Facsimile: (904) 379-7803
attorney@broadcast.net

November 19, 2002

² See revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992)

TECHNICAL EXHIBIT

IN SWPORT OF
PETITION FOR RULE MAKING
NEW FM – CHANNEL 249A
NANTUCKET, MASSACHUSETTES

PAUL B. CHRISTENSEN
PETITIONER

INTRODUCTION

This Technical Exhibit supports the petition by Paul B. Christensen (hereinafter “Petitioner”), who seeks to amend the FM Table of Allotments, §73.202(b) of the Federal Communications Commission’s Rules, by allocating FM Channel 249A to Nantucket, Massachusetts as that community’s second local FM aural service.

ALLOCATION

A comprehensive engineering study ~~was~~ performed, utilizing the current FCC/NTIS database to determine the feasibility of allocating FM Channel 249A to Nantucket, Massachusetts, subject to the §73.207(b) minimum distance requirements of the Commission’s Rules. The study incorporates all applicable co-channel, adjacent-channel, and intermediate-frequency separations. The results of the study indicate that FM Channel 249A may be allocated to Nantucket in full compliance with §73.207(b).

Attached hereto as Exhibit A is an “area-to-locate” study for FM Channel 249A. The Exhibit depicts the required protection contours from all relevant co-channel, adjacent channel, and intermediate-frequency-limited stations and allocations. **As** indicated,

ample area exists immediately in and near the community boundary in which the proposed facilities may be located.

Assuming a maximum effective radiated power of six (6) Kilowatts and the installation of an omni-directional antenna placed at one hundred (100) meters above average terrain, the proposed transmission facilities could be located in or near the community's boundaries while maintaining the requisite city-grade (70 dBu) coverage contour over the entire city, in full compliance with §73.315(a) and (b). Attached hereto and presented as Exhibit B is a graphical representation of a city-grade service contour from the Petitioner's geographical reference coordinates, located within the permissible area-to-locate geographical area.

CONCLUSION

As demonstrated herein, the proposed amendment to the FM Table of Allotments can be achieved in compliance with §73.207(b), and §73.315(a) and (b) and will not create a short-spacing condition to any existing station, pending application, or vacant allotment; nor will the amendment result in the reallocation of any station, pending application or vacant allotment.

EXHIBIT A

73.207 Analysis

Job: Nantucket.fmj

Master Database:

Lat: N41:17:12 Lon: W070:06:06 NAD-83

Scale: 1:500000

Channel: 249 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km, Clearance: -0.5km

Comments: No Comments

Description:

Date: 11/18/02 1:42:07 PM

Key:

Short

Clear

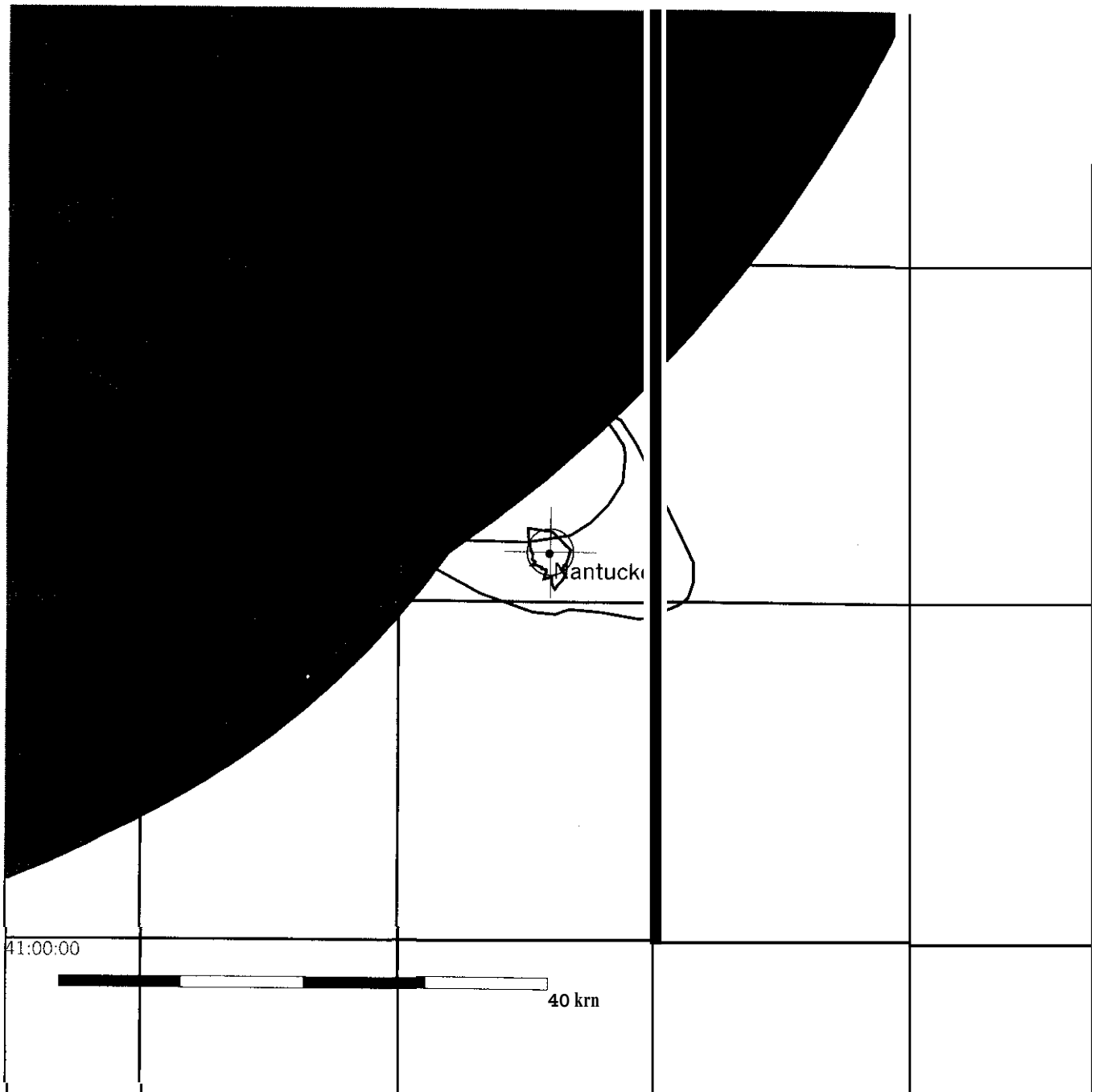


EXHIBIT B

Contour Analysis

Job Nantucket.fmi

Master Database:

Lat: N41:17:12 Lon: W070:06:06 NAD-83

Scale: 1:750000

Channel 249 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km, Clearance: -0.5km

Comments: No Comments

Description:

Date: 11/18/02 1:42:23 PM

Key:

Service

Protected

2nd/3rd Adj

